

ZMO LAW PLLC

March 10, 2025

Via ECF and email

Hon. Laura Taylor Swain
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: *United States v. Adam Bonano*, 13 Cr. 957 (LTS), 23 Cr. 645 (LTS)

Dear Judge Swain:

This office represents Adam Bonano in the above-captioned matters. I write to request the Court “so-order” this letter to direct the United States Probation Office for the Southern District of New York (“Probation”) to return property seized from Mr. Bonano at the time of his arrest. I have conferred with Probation over the last several months and I understand that they do not object to returning the property but that they require a court order to do so. I have also conferred with AUSA Thomas Wright and he advises the government takes no position on this application.

The property at issue consists of \$42,220 in U.S. currency seized from Mr. Bonano at the time of his arrest on June 14, 2023. Mr. Bonano has directed Probation, in a signed writing, to return the money by issuing a check to his wife Tiana Jines, who is in contact with my office.

No order of forfeiture or restitution was entered at Mr. Bonano’s sentencing.

Thank you for your attention to this matter.

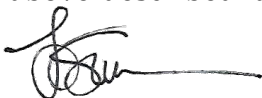
Very truly yours,

Zachary Margulis-Ohnuma

Zachary Margulis-Ohnuma

CC: AUSA Thomas Wright

The foregoing request is granted. The Probation Office is respectfully directed to return the above-described funds seized from Mr. Bonano at the time of his arrest. SO ORDERED.



Laura Taylor Swain, Chief USDJ

March 11, 2025